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October 30, 2013

BY CERTIFIED MAIL

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Re: Clean Water Action Complaint against UFP Belchertown, LLC, UFP Northeast, LLC,
and Universal Forest Products Eastern Division, Inc.

Dear Sirs and Madam:

In accordance with Section 505(c)(3) of the Federal Water Pollution Control Act, 33 U.S.C. § 1365 (c)(3), and 40 CFR 135.4, we are enclosing a conformed copy of a complaint filed by this office on behalf of Clean Water Action against UFP Belchertown, LLC, UFP Northeast, LLC, and Universal Forest Products Eastern Division, Inc. on October 30, 2013.

Sincerely,

Nora J. Chorover /KMC

Nora J. Chorover

Enclosure

cc: Kenneth Kimmel, Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
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Filed Electronically 10/30/2013

Attorneys for Plaintiff
CLEAN WATER ACTION

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CLEAN WATER ACTION,

Plaintiff,

v.

UFP BELCHERTOWN, LLC, UFP
NORTHEAST, LLC, UNIVERSAL
FOREST PRODUCTS EASTERN
DIVISION, INC.

Defendants.

Case No.

**COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF AND CIVIL PENALTIES**

(Clean Water Act,
33 U.S.C. §§ 1251 to 1387)

CLEAN WATER ACTION (“CWA”) by and through its counsel, hereby alleges:

INTRODUCTION

1. This is a civil suit brought under the citizen suit enforcement provisions of the Clean Water Act, 33 U.S.C. § 1251, et seq. (the “Clean Water Act” or “the Act”). Plaintiff seeks declaratory judgment, injunctive relief, and other relief the Court deems appropriate with regard to actions taken by UFP Belchertown, LLC, UFP Northeast, LLC, and Universal Forest Products Eastern Division, Inc. (collectively “Defendant” or “UFP”), which resulted in the discharge of stormwater runoff from the UFP facility at or around 155 Bay Road in Belchertown, Massachusetts (“the Facility”), into waters of the United States, in violation of the Act.

2. Activities that take place at industrial facilities, such as material handling and storage, are often exposed to the weather. As runoff from rain or snow melt comes into contact with these materials, it picks up pollutants and transports them to nearby storm sewer systems, rivers, lakes, or coastal waters. Stormwater pollution is a significant source of water quality problems for the nation's waters. The Massachusetts Department of Environmental Protection has determined that stormwater runoff represents the single largest source responsible for water quality impairments in the Commonwealth's rivers, lakes, ponds, and marine waters.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over the parties and the subject matter of this action pursuant to Section 505(a)(1)(A) of the Act, 33 U.S.C. § 1365(a)(1)(A), and 28 U.S.C. § 1331 (an action arising under the laws of the United States).

4. On August 8, 2013, Plaintiff provided notice of Defendant's violations of the Act, and of its intention to file suit against Defendant (the "Notice Letter"), to the Administrator of the United States Environmental Protection Agency ("EPA"); the Administrator of EPA Region 1; the Commissioner of the Massachusetts Department of Environmental Protection ("DEP"); and to Defendant, as required by the Act, 33 U.S.C. § 1365(b)(1)(A).

5. More than sixty days have passed since notice was served on Defendant and the state and Federal agencies. Plaintiff is informed and believes, and thereupon alleges, that neither the EPA nor the Commonwealth of Massachusetts has commenced or is diligently prosecuting a court action to redress the violations alleged in this complaint. This action is not barred by any prior administrative penalty under Section 309(g) of the Act, 33 U.S.C. § 1319(g).

6. Venue is proper in the District Court of Massachusetts pursuant to Section 505(c)(1) of the Act, 33 U.S.C. § 1365(c)(1), because the source of the violations is located within this judicial district. Plaintiff selects venue in the Springfield Division pursuant to Local Rule 40.1(D)(2) because the alleged violations occurred in that division and the defendant is located in that division.

PARTIES

7. Plaintiff CLEAN WATER ACTION (“CWA”) is a nationwide non-profit public benefit corporation organized under the laws of the District of Columbia, with offices located in Boston and Northampton, Massachusetts. CWA has approximately 50,000 members who live, recreate, and work in and around waters of the Commonwealth of Massachusetts, including Batchelor Brook. CWA is dedicated to working for clean, safe and affordable water, protection of natural resources, the prevention of health-threatening pollution, the creation of environmentally safe jobs and businesses, and the empowerment of people to make democracy work. To further these goals, CWA actively seeks Federal and state agency implementation of the Act and other laws and, where necessary, directly initiates enforcement actions on behalf of itself and its members.
8. Members of CWA have a recreational, aesthetic and/or environmental interest in Batchelor Brook. One or more of such members who reside in the Belchertown area use and enjoy Batchelor Brook for recreation, sightseeing, wildlife observation and/or other activities in the vicinity of and downstream of Defendant’s discharges. These members use and enjoy the waters into which Defendant has caused, is causing, and will continue to cause, pollutants to be discharged. The interests of CWA’s members have been, are being, and will continue to be adversely affected by Defendant’s failure to comply with the Clean Water Act, as alleged herein. The relief sought herein will redress the harms to Plaintiff caused by Defendant’s activities.
9. Continuing commission of the acts and omissions alleged herein will irreparably harm Plaintiff and the citizens of the Commonwealth of Massachusetts, for which harm they have no plain, speedy, or adequate remedy at law.
10. Defendant UFP Belchertown, LLC is a corporation organized under the laws of the State of Michigan that operates a Timber Products facility in Belchertown, Massachusetts.
11. Defendant UFP Northeast, LLC is a corporation organized under the laws of the State of Michigan.
12. Defendant Universal Forest Products Eastern Division, Inc. is a corporation organized under the laws of the State of Michigan.

13. Plaintiff alleges on information and belief that UFP Belchertown, LLC is owned and operated by UFP Northeast, LLC and that UFP Belchertown, LLC and UFP Northeast, LLC are controlled and/or operated by Universal Forest Products Eastern Division, Inc.

STATUTORY BACKGROUND

14. Pollutant Discharges without a Permit are Illegal. The Clean Water Act makes the discharge of pollution into waters of the United States unlawful unless the discharge is in compliance with certain statutory requirements, including the requirement that the discharge be permitted by the Federal Environmental Protection Agency (“EPA”) under the National Pollutant Discharge Elimination System (“NPDES”). Sections 301(a), 402(a) and 402(p) of the Act. 33 U.S.C. §§ 1311(a), 1342(a), 1342(p).

15. EPA Has Made Stormwater Discharges from Timber Products Facilities Subject to the Requirements of EPA’s General Industrial Stormwater Permit. In order to minimize polluted stormwater discharges from industrial facilities, the EPA has issued a general industrial stormwater permit (“Stormwater Permit”). EPA first issued the Stormwater Permit to UFP in 1995 and reissued the permit in 2000 and 2008. See 60 Fed. Reg. 50804 (Sept. 29, 1995); 65 Fed. Reg. 64746 (Oct. 30, 2000); 73 Fed. Reg. 56572 (Sept. 29, 2008). Timber products facilities are subject to the requirements of this Stormwater Permit. Stormwater Permit, Appendix D, pg. 47-49.

16. Timber Products Facilities Must Comply with the Monitoring and Reporting Requirements of the Stormwater Permit. The Stormwater Permit requires these facilities to, among other things:

- a. ensure that stormwater discharges do not cause or have the reasonable potential to cause or contribute to a violation of water quality standards, Stormwater Permit, pg. 16;
- b. conduct monitoring of stormwater discharges at all Facility outfalls in each of the first four full quarters of permit coverage for compliance with benchmark limitations applicable specifically to timber products facilities, Stormwater Permit, pp. 36, 47-49;
- c. report all monitoring results for all Facility outfalls to EPA by specified deadlines, Stormwater Permit, pg. 41;

- d. conduct corrective action after the average of four quarterly samples exceeds the EPA benchmark value, Stormwater Permit, pp. 18, 36;
 - e. conduct routine facility inspections at least quarterly, quarterly visual assessments, and annual comprehensive inspections to, among other things, sample and assess the water quality of the facility's stormwater discharges, ensure that stormwater control measures required by the Permit are functioning correctly and are adequate to minimize pollutant discharge, and timely perform corrective actions when they are not, Stormwater Permit, pp. 18-25;
 - f. timely prepare and submit to EPA annual reports that include findings from the annual comprehensive site inspections and documentation of corrective actions, Stormwater Permit, pp. 24, 41; and
 - g. comply with any additional state requirements, *see* Stormwater Permit, pp. 140-141.
17. Citizens May Bring an Action to Enforce these Requirements. Section 505(a)(1) and Section 505(f) of the Act provide for citizen enforcement actions against any "person," including individuals, corporations, or partnerships, for violations of NPDES permit requirements and for unpermitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), § 1362(5). An action for injunctive relief under the Act is authorized by 33 U.S.C. § 1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to \$37,500 per day, pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365 and 40 C.F.R. §§ 19.1 - 19.4.

STATEMENT OF FACTS

18. Defendant owns and operates a facility at 155 Bay Road, Belchertown, Massachusetts (the "Facility"). Operations at the Facility include timber products (standard industrial classification 2491).
19. On March 1, 2010, UFP submitted a Notice of Intent to be covered by the Stormwater Permit.
20. Numerous activities at the Facility take place outside and are exposed to rainfall. These include, without limitation, outdoor stockpiling of materials, transportation of materials, and

material loading and unloading. Untreated and treated lumber is stored outside at the Facility and is exposed to precipitation.

21. Industrial machinery and heavy equipment, including trucks and fork lifts, are operated, maintained, or stored at the Facility in areas exposed to stormwater flows. Plaintiff is informed and believes, and thereupon alleges, that the operation, maintenance, and/or storage of such machinery and equipment results in spilling and leaking of contaminants such as oil, grease, diesel fuel, anti-freeze and hydraulic fluids, which leaves contaminants exposed to stormwater flows.

22. During every rain event, rainwater flowing over areas of the Facility becomes contaminated with pollutants.

23. Plaintiff is informed and believes, and thereupon alleges, that rainwater and snow melt (collectively referred to hereinafter as "Stormwater") flowing over the Facility collects at various locations at the Facility.

24. The polluted stormwater from the Facility discharges into Batchelor Brook. Control measures taken at the Facility are inadequate to prevent such discharges from exceeding the Stormwater Permit's benchmark standards for Chemical Oxygen Demand, Total Suspended Solids, and Total Copper.

25. UFP is required to monitor Chemical Oxygen Demand to indirectly measure the amount of organic compounds in its Stormwater. Organic compounds act as a food source for water-borne bacteria. Bacteria decompose these organic materials using dissolved oxygen, thus reducing the oxygen present for fish and aquatic organisms. Excessive levels of chemical oxygen demand can asphyxiate and kill fish by depriving them of oxygen.

26. Total Suspended Solids in high concentrations block sunlight from reaching vegetation submerged in water bodies, and can cause many problems for water quality and aquatic life, including decreased dissolved oxygen, habitat alteration, and increased pathogens.

27. Excessive levels of copper are toxic to fish, aquatic plants, and other aquatic life. They are also hazardous to human life if they enter the water supply.

28. Arsenic and many of its compounds are especially potent poisons and are toxic to fish, aquatic plants, and other aquatic life. Arsenic is also hazardous to human life.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Failure to Reduce and/or Eliminate Pollutants to the Extent Achievable: Violations of 33 U.S.C. § 1311(a)

29. Plaintiff re-alleges and incorporates Paragraphs 1-28, inclusive, as if fully set forth herein.

30. Since at the latest June 1, 2010, UFP has failed to ensure that its control measures reduce and/or eliminate pollutants in its stormwater discharges to the extent achievable, using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice. Stormwater Permit, section 2.0 (pg. 12).

31. Since at the latest June 1, 2010, defendant has failed to comply with the Stormwater Permit's requirement to modify its control measures as expeditiously as practicable whenever it finds that they "are not achieving their intended effect of minimizing pollutant discharges." General Permit, section 2.1.

32. Since at the latest June 1, 2010, defendant has failed to take adequate corrective action, as set forth in Section 3.2, after the average of four quarterly sample results exceeded applicable benchmarks. To the extent corrective action was taken by the company following the triggering of this event, such corrective action was inadequate, as evidenced by the persistent exceedence of the benchmarks.

33. As shown on a Table attached hereto as Exhibit A, UFP's stormwater discharges have been many magnitudes above EPA benchmark levels since June 1, 2010. The presence and persistence of these exceedences shows that the company has not complied with its requirement to "modify" its control measures "as expeditiously as practicable" to minimize its pollutant discharges to the extent achievable.

34. Each of Defendant's violations of the reduction and/or elimination requirements of the Stormwater Permit is a separate and distinct violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a), for each day on which the violation occurred and/or continued, as set forth on Exhibit B hereto. Alternatively, each of these violations is a separate and distinct violation for each day on which stormwater was discharged from the Facility and on which the failure to reduce and/or eliminate pollutants occurred and/or continued. To the extent it is determined that rain dates are relevant in determining the dates of violations, such dates through October 17, 2013, are set forth on Exhibit C.

SECOND CAUSE OF ACTION

Failure to Comply with the Monitoring Requirements of the Stormwater Permit: Violations of 33 U.S.C. § 1311(a)

35. Plaintiff re-alleges and incorporates Paragraphs 1-34, inclusive, as if fully set forth herein.

36. Defendant has failed to comply with the Stormwater Permit's requirement for monitoring of discharges to Batchelor Brook. Defendant failed to conduct monitoring of the stormwater discharges from the Facility for compliance with the benchmark limitations during the following quarters: January-March 2011, and October-December 2012. Defendant also failed to monitor for the presence of arsenic at outfall 002 during the January-March 2013 quarter. [Stormwater Permit, pg. 36, section 6.2.1.2.]

37. These violations, which are set forth on Exhibit B hereto, establish an ongoing pattern of failure to comply with the Stormwater Permit's monitoring requirements.

38. Each of Defendant's violations of the monitoring requirements of the Stormwater Permit is a separate and distinct violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a), for each day on which the failure to monitor occurred and/or continued. Alternatively, each of these violations is a separate and distinct violation for each day on which stormwater was discharged from the Facility and on which the violation occurred and/or continued. To the extent it is determined that rain dates are relevant in determining the dates of violations, such dates through October 17 are set forth on Exhibit C.

THIRD CAUSE OF ACTION

**Failure to Comply with the Reporting Requirements of the Stormwater Permit:
Violations of 33 U.S.C. § 1311(a)**

39. Plaintiff re-alleges and incorporates Paragraphs 1-38 inclusive, as if fully set forth herein.

40. Defendant has failed to comply with the Stormwater Permit's requirement for reporting benchmark monitoring results to EPA. Defendant has failed to report to EPA results of benchmark monitoring it has conducted, if any, within 30 days of receipt of monitoring results, as required by the Stormwater Permit. Stormwater Permit, [7.1] Defendant's violations of the Stormwater Permit's reporting requirements are separate and distinct from violations of the Stormwater Permit's monitoring requirements.

41. These violations, which are set forth on Exhibit B, establish an ongoing and continuing pattern of failure to comply with the Stormwater Permit's reporting requirements.

42. Each of Defendant's violations of the benchmark monitoring reporting requirements of the Stormwater Permit is a separate and distinct violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a), for each day on which the failure to report occurred and/or continued. Alternatively, each of these violations is a separate and distinct violation for each day on which stormwater was discharged from the Facility and on which the violation occurred and/or continued. To the extent it is determined that rain dates are relevant in determining the dates of violations, such dates through October 17 are set forth on Exhibit C.

RELIEF REQUESTED

Wherefore, Plaintiff respectfully requests that this Court grant the following relief:

1. Declare Defendant to have violated and to be in violation of the Act as alleged herein;
2. Enjoin Defendant from discharging pollutants from the Facility into the wetlands and surface waters surrounding and downstream from the Facility;
3. Require Defendant to implement the requirements of the Stormwater Permit;

4. Order Defendant to pay civil penalties of up to \$37,500 per day of violation, pursuant to Sections 309(d) and 505(a) of the Act, 33 U.S.C. §§ 1319(d), 1365(a) and 74 Fed. Reg. 626, 627 (2009);
5. Order Defendant to take appropriate actions to restore the quality of navigable waters impaired by their activities;
6. Award Plaintiff's costs (including reasonable investigative, attorney, witness, and consultant fees) as authorized by the Act, 33 U.S.C. § 1365(d); and
7. Award any such other and further relief as this Court may deem appropriate.

Dated: 10/30/2013

Respectfully submitted,

/s/Nora J. Chorover

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CLEAN WATER ACTION

CLEAN WATER ACTION'S CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Massachusetts District Court Local Rule 7.3, Plaintiff Clean Water Action states that it does not have a parent corporation and no publicly held company owns 10% or more of its stock.

EXHIBIT A**TABLE OF MONITORING RESULTS****OUTFALL #1:**

Monitoring Date	Copper (Benchmark .0038 mg/L)	TSS (Benchmark: 100 mg/L)	COD (Benchmark: 120 mg/L)
6/1/10	.127	438	79
9/8/10	.189	260	240
12/1/10	.0325	1810	230
3/11/11	.097	408	91
6/22/11	.164	2020	360
8/15/11	.079	718	120
10/27/11	.019	174	16
Jan-Mar 2012	Not monitored or reported	Not monitored or reported	Not monitored or reported
4/23/12	.105	572	140
9/6/12	.054	194	48
Oct-Dec 2012	Not monitored or reported	Not monitored or reported	Not monitored or reported
Jan-Mar 2013	.0609	174	83

OUTFALL #2:

Monitoring Date	Copper (Benchmark: .0038 mg/L)	TSS (Benchmark: 100 mg/l)	COD (Benchmark: 120.mg/L)	ARSENIC (Benchmark: 0.15 mg/L)
4/23/12	1.44	2820	380	
9/6/12	.645	1310	170	
Oct-Dec 2012	Not monitored or reported	Not monitored or reported	Not monitored or reported	
Jan-Mar 2013	.892	1470	420	Not monitored or reported ("sample lost")

EXHIBIT B**UFP VIOLATIONS**

Type of Violation	Parameters	Relevant Quarter	Beginning Date of Violation	Earliest End Date of Violation
Failure to Minimize Pollutants and Implement Adequate Corrective Action	Copper	n/a	June 1, 2010	The present
Failure to Minimize Pollutants and Implement Adequate Corrective Action	TSS	n/a	June 1, 2010	The present
Failure to Minimize Pollutants and Implement Adequate Corrective Action	COD	n/a	December 1, 2010	The present
Failure to Monitor for Compliance with Benchmark Limits	TSS	January-March 2011	March 31, 2011	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	TSS	January-March 2011	April 30, 2011	The present
Failure to Monitor for Compliance with Benchmark Limits	Total Copper	January-March 2011	March 31, 2011	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	Total Copper	January-March 2011	April 30, 2011	The present
Failure to Monitor for Compliance with Benchmark Limits	COD	January-March 2011	March 31, 2011	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	COD	January-March 2011	April 30, 2011	The present
Failure to Monitor for Compliance with Benchmark Limits	TSS	October-December 2012	December 31, 2012	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	TSS	October-December 2012	January 31, 2013	The present
Failure to Monitor for Compliance with Benchmark Limits	Total Copper	October-December 2012	December 31, 2012	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	Total Copper	October-December 2012	January 31, 2013	The present

Type of Violation	Parameters	Relevant Quarter	Beginning Date of Violation	Earliest End Date of Violation
Failure to Monitor for Compliance with Benchmark Limits	COD	October-December 2012	December 31, 2012	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	COD	October-December 2012	January 31, 2013	The present
Failure to Monitor for Compliance with Benchmark Limits	Arsenic	January-March 2013	March 31, 2013	The present
Failure to Report on Monitoring for Compliance with Benchmark Limits	Arsenic	January-March 2013	April 30, 2013	The present

EXHIBIT C

DAYS BETWEEN
JUNE 1, 2010 AND OCTOBER 17, 2013
ON WHICH STORMWATER FROM FACILITY
DISCHARGED TO WATERS OF THE UNITED STATES

June 2010:	2, 5, 7, 10, 11, 13, 17, 23
July 2010:	11, 17, 20, 24, 25
August 2010:	10, 16, 17, 23, 25
September 2010:	17, 28
October 2010:	1, 2, 7, 14, 15, 22, 27, 28
November 2010:	5, 6, 8, 17, 26
December 2010:	2, 13, 27
January 2011:	12, 13, 18, 19, 21, 22, 25, 27
February 2011:	2, 3, 6, 8, 21, 25, 26, 27
March 2011:	1, 7, 11, 12, 17, 22
April 2011:	1, 5, 6, 13, 14, 17, 20, 24, 27, 29
May 2011:	5, 8, 16, 17, 18, 19, 20, 21, 23, 24, 25, 31
June 2011:	2, 9, 10, 12, 16, 18, 24, 26, 29
July 2011:	8, 9, 26, 27, 30
August 2011:	2, 5, 7, 8, 10, 11, 15, 16, 22, 26, 28, 29
September 2011:	6, 7, 8, 9, 21, 22, 23, 24, 29, 30
October 2011:	1, 2, 3, 4, 5, 13, 14, 15, 20, 27, 28, 30
November 2011:	11, 17, 23, 30
December 2011:	7, 8, 22, 23, 28, 31
January 2012:	12, 13, 17, 19, 20, 22, 24, 27, 28
February 2012:	17, 25
March 2012:	1, 2, 13
April 2012:	2, 22, 23, 27
May 2012:	2, 3, 8, 9, 10, 15, 16, 17, 30
June 2012:	2, 3, 4, 5, 9, 13, 14, 26
July 2012:	3, 4, 16, 24, 29
August 2012:	2, 6, 10, 11, 13, 15, 16, 18, 28, 29
September 2012:	5, 6, 8, 9, 19, 23, 28, 29
October 2012:	1, 3, 5, 8, 11, 14, 16, 20, 30
November 2012:	13, 14, 28
December 2012:	8, 10, 17, 18, 21, 22, 27, 28, 30
January 2013:	13, 16, 17, 29, 30, 31
February 2013:	1, 11, 12, 20, 27
March 2013:	8, 13, 19, 20,
April 2013:	1, 9, 10, 11, 12, 16, 20, 25
May 2013:	9, 10, 12, 16, 20, 22, 24, 25, 26, 29, 30
June 2013:	3, 4, 7, 8, 11, 12, 14, 18, 19, 25, 28, 29

July 2013: 2, 8, 11, 23, 24, 26
August 2013: 2, 10, 14, 27, 29
September 2013: 1, 2, 10, 12, 22
October 2013: 4, 5, 6, 7